

October 26, 2016

Marlene H. Dortch, Secretary
Federal Communications Commission
442 12th Street, SW
Washington, D.C. 20554

Comment via Electronic Filing

RE: WC Docket No. 12-375 - Comment

Dear Ms. Dortch,

In its *Opposition to Petition for Partial Reconsideration*, ICSolutions included an offer submitted by Securus to the Georgia DOC with rates below the maximum caps in the FCC's Order No. 15-136. In addition, despite Securus' previously repeated claims that ICSolutions was in violation of law because ICSolutions continued to honor its customer contracts which included the sharing of profits on Interstate calling, Securus' offer to Georgia DOC included the payment of commissions on Interstate calling.

It has recently come to our attention that Global Tel*Link (GTL) has submitted a financial offer for \$0.0125 per minute for all calls, domestic and international, prepaid, debit, and collect – which is **significantly** below the rates in any of the FCC's Rate Orders and inconsistent with the claims that the FCC's rates do not allow the providers to recover costs. The financial offer, which was submitted to the Nebraska DOC on June 17, 2016, is shown on Page 2 of the Pricing Summary, as well as in the Cost Proposal (Pages 15 to 16) , both of which are included in Attachment 1 to this filing. In addition, Pages 2 to 13 of the Pricing Summary has tables of the calling features and services included with the financial offer of \$0.0125 per minute, which appears to include all the necessary functions for providing safe, secure, and reliable inmate telephone services. Based upon GTL's offer, the Nebraska DOC awarded the contract to GTL.

Respectfully,



Tim McAteer, President

Cc: Chairman Tom Wheeler
Commissioner Mignon Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
Commissioner Michael O'Rielly
Matthew DelNero, Bureau Chief

Stephanie Weiner, Legal Advisor to Chairman Wheeler
Claude Aiken, Legal Advisor to Comm'r Clyburn
Travis Litman, Legal Advisor to Comm'r Rosenworcel
Nicholas Degani, Legal Advisor to Comm'r Pai
Amy Bender, Legal Advisor to Comm'r O'Rielly
Madeleine V. Findley, Deputy Bureau Chief